

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:

MMA LAW FIRM, PLLC,

Debtor.

§ Case No. 24-31596
§ Chapter 11
§

CRISTÓBAL M. GALINDO, P.C. D/B/A
GALINDO LAW,

Plaintiff,

vs.

MMA LAW FIRM, PLLC,

Defendant.

§ Adversary Proceeding No. 25-03310
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**EMERGENCY UNOPPOSED MOTION OF CRISTÓBAL M. GALINDO, P.C.
D/B/A GALINDO LAW TO EXTEND DEADLINE TO FILE
A SUR-REPLY TO MMA LAW FIRM, PLLC'S REPLY TO THE
PLAINTIFF'S RESPONSE TO MMA LAW FIRM'S
MOTION FOR SUMMARY
JUDGMENT AND THE SUPPLEMENT TO THE REPLY**

(Relates to Docket No. 100)

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

Emergency relief is requested on Friday, July 18, 2025.

TO THE HONORABLE EDUARDO V. RODRIGUEZ
CHIEF UNITED STATES BANKRUPTCY JUDGE:

Cristóbal M. Galindo, P.C. d/b/a Galindo Law Firm (“**GLF**” or “**Galindo**”), by and through its undersigned counsel, hereby submits this Emergency Unopposed Motion to Extend Deadline to file a Sur-Reply to MMA Law Firm, PLLC’s Reply to the Plaintiff’s Response to MMA Law Firm’s Motion for Summary Judgment and the Supplement to the Reply [Docket Nos. 90 and 92], and would respectfully show as follows:

I. RELIEF REQUESTED

1. GLF seeks to extend the deadline to file a Sur-Reply (the “**Sur-Reply**”) to MMA Law Firm’s Reply to the Plaintiff’s Response to MMA Law Firm’s Motion for Summary Judgment and the Supplement to the Reply (collectively, the “**Combined Reply**”) [Docket Nos. 90 and 92], filed by the Debtor MMA Law Firm, PLLC (“**Debtor**,” “**MMA**,” or “**Defendant**”).

II. JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the Southern District of Texas (the “**Court**”) has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. 3.

3. The bases for the relief requested herein are Sections 105(a) of Title 11 of the United States Code.

III. BASIS FOR RELIEF

4. Currently, the deadline for the Sur-Reply is Friday, July 18, 2025 [Docket No. 100].

5. On Thursday, July 17, 2025, this Court entered an Order that contains a show cause provisions against GLF and its main counsel [Docket No. 106]. Therefore, since that time, GLF and its main counsel have spent considerable time relating to issues raised by the show cause provisions.

6. GLF seeks to extend the deadline to file the Sur-Reply to through and including Monday, July 21, 2025. This request is not intended to delay the judicial process but to allow GLF more time to re-focus on the Sur-Reply.

7. MMA's counsel does not oppose the extension to through and including Monday, July 21, 2025. It does not agree, but it does not oppose.

IV. EMERGENCY CONSIDERATION

8. The current deadline for the Sur-Reply is today, Friday, July 18, 2025, p.m. and GLF is seeking to extend the deadline to through and including Monday, July 21, 2025.

V. PRAYER

WHEREFORE, GLF requests this Court enter an Order allowing GLF to file a Sur-Reply to the Combined Reply by the deadline of through and including Friday, July 18, 2025, and granting such other relief as the Court deems just and proper.

Dated: July 18, 2025

Respectfully submitted,

RUTH A. VAN METER, P.C.

By: /s/ Ruth Van Meter
Ruth Van Meter
State Bar No. 20661570
ruth@vanmeterlaw.com
9322 Shady Lane Circle
Houston, Texas 77063
(713) 858-2891 (Direct)

**COUNSEL FOR Cristóbal M. GALINDO, P.C.
D/B/A GALINDO LAW FIRM**

CERTIFICATE OF CONFERENCE

Pursuant to the Local Rules, GLF reached out to MMA regarding this Motion. MMA's counsel stated that it does not agree to this Motion but does not oppose it.

Ruth Van Meter _____

Ruth Van Meter

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 18, 2025, a true and correct copy of this Motion was filed with the Court and served via the Court's CM/ECF system upon all parties registered to receive such electronic service in this bankruptcy case, including the U.S. Trustee and the following parties.

Johnie Patterson
Miriam Goott
Walker & Patterson, P.C.
4815 Dacoma
Houston, Texas 77092
713.956.5577
713.956.5570 fax
jjp@walkerandpatterson.com
mgoott@walkerandpatterson.com

Ruth Van Meter _____

Ruth Van Meter